



**SERRRC**

ALASKA'S EDUCATIONAL  
RESOURCE CENTER

Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

July 8, 2014

Dear Sir/Madame,

We would like to express our concern with the FCC's proposal to distribute portions of E-rate funding on a per-pupil allocation. Of Alaska's 53 school districts, only three are located in an urban area. The remaining, 50 are rural remote; the majority is off the road system and accessible only by air or the state marine highway, and have low density student populations. Our state's rural remote students already face multiple obstacles when accessing high quality, high speed internet access. By moving to a per-pupil structure, this would have a negative impact and jeopardize the already tentative internet connectivity to schools, therefore creating an even greater disparity in quality educational opportunities for students.

The proposed per-pupil method assumes "one-size-fits-all" costs for all E-rate applicants – no matter a school's enrollment or geographic location. We strongly believe that the E-rate program must continue to distribute funds in an equitable way, based on need, and not by a formula that will diminish support for all areas. While we do not support a per-pupil distribution model for funding Wi-Fi connectivity, we do believe that an adjustment to the cap would provide additional funding to invest in the Commission's proposed five-year Wi-Fi connections plan.

As the acting Education Service Agency (ESA) for the state of Alaska, SERRRC has the unique opportunity to witness firsthand the inequality of services in some of our most needy schools. With the mandated online formative assessments it is most critical that all of our schools, especially in rural remote locations be brought up to current standards to meet the needs of our students. The per-pupil proposal will essentially restrict a rural school district's ability to provide quality learning opportunities for all students.

We are also troubled that the FCC proposes a five-year timeline for these changes yet only provides funding for the first two years. As currently structured, this plan leaves the program in a position of drawing desperately needed funding away from Priority I (basic connectivity) to Priority II (internal connections). We are concerned this set of changes focuses funding on internal connections in a way that threatens basic, monthly connectivity (telecommunications and internet access). Also troubling is the proposed adjustment of the discount matrix for the neediest schools. Reducing the top-tier discount level from 90% to 80% will present an even further fiscal strain on districts by doubling their out-of-pocket expenses.

Thank you for considering my response as you proceed with your decision on the E-rate program. At SERRRC, we commend the FCC for its continued efforts to protect the already oversubscribed E-rate program by ensuring the future of this successful program. I urge you to support significant increased funding for the E-rate program, and to ensure that the program and its limited resources are protected and preserved.

Sincerely,

Kela Halfmann, E-rate Coordinator  
SERRRC – Alaska's Educational Resource Center